

# Exhibit 3



6. Tetyna Dewar is Vijay Dewar's second wife.
7. During the time I worked at Gold Crown, Vijay and Tetyna Dewar had a seven-or eight-year-old son who I believe received a paycheck from Gold Crown.
8. Vijay Dewar always made it known that he was the owner of Gold Crown and the person in charge.
9. Nevin Dewar attempted to fire me on at least three occasions.
10. Each time Nevin Dewar told me that I was fired, I immediately called Vijay Dewar.
11. Vijay Dewar always responded that he was the only person who had the authority to fire me and stated that I was not fired.
12. Vijay Dewar instructed and managed Nevin Dewar.

***Gold Crown is An Integrated Enterprise with At Least 15 Employees***

13. During the time I worked at Gold Crown, Vijay Dewar owned four apartment complexes in the Kansas City area including: Prospect Studios in Gladstone, Missouri; Mission Road Studios in Kansas City, Kansas; The Park in Overland Park, Kansas; and Torries Chase in Olathe, Kansas.
14. Employees were often moved around to perform different jobs at the various apartment complexes for the benefit of Gold Crown.
15. During my time at Gold Crown as a Regional Manager (discussed infra), I acquired knowledge regarding the number of employees who worked at the four apartment complexes.
16. The Park was staffed with 3 Managers, 3-4 Maintenance workers, 2-3 Cleaning Employees and 1-2 groundskeepers.
17. Prospect Studios was staffed with 1 Manager and 1 Maintenance employee.

18. Mission Road Studios was staffed with 1 Manager and 1 Maintenance employee.

19. Torries Chase was staffed with 1 Manager and 1 Maintenance employee.

20. On a weekly basis, Nevin Dewar also brought in workers he found on Craigslist to perform various construction projects in the individual apartments and the apartment buildings.

21. The majority of these construction workers would get their projects nearly completed and then be "fired" by Nevin Dewar (presumably at the direction of Vijay Dear) for the stated reason that their work was defective. The construction workers who were fired were not paid for their services.

***Tonya Teegarden Application***

22. In approximately August 2015, I interviewed Tonya Teegarden.

23. During Ms. Teegarden's interview, she told me that she was disabled and could only accept part-time work.

24. After Ms. Teegarden's interview, I told Vijay Dewar that Ms. Teegarden was only interested in part-time work because she was disabled.

***Tonya Teegarden was Offered Full-Time Employment***

25. Although Tonya Teegarden requested part-time work due to having a disability, Vijay Dewar hired Ms. Teegarden for a full-time position.

26. Shortly after Tonya Teegarden was hired, she was sent to The Park Apartments to work.

***My Position Changed to Regional Manager***

27. In approximately September or October 2015, Vijay Dewar changed my position to Regional Manager.

28. After I was made the Regional Manager, I initially had a desk at Prospect Studios. In October or November 2015, I was moved to a desk in The Park.

29. As a Regional Manager, I performed services for Prospect Studios, The Park, Mission Road Studios, and Torries Chase.

***Disability Slurs***

30. Tonya Teegarden was working at The Park when I started there.

31. I frequently heard Vijay Dewar make comments that Tonya Teegarden was "crazy" and "bipolar."

32. Nevin Dewar frequently yelled at Tonya Teegarden and belittled her.

33. Vijay Dewar frequently yelled at Tonya Teegarden and said, "You are crazy," "You are stupid," and "You are bipolar."

34. On at least one occasion, I heard Vijay Dewar yell at Tonya Teegarden and call her a "schizophrenic bitch."

35. Vijay Dewar told me numerous times, "You gotta get rid of her [referring to Tonya Teegarden] because she's crazy."

36. Vijay Dewar yelled at Tonya Teegarden so much that in response, Tonya Teegarden frequently stated that she quit. Somehow, Vijay Dewar always convinced Tonya to resume her employment.

***National Origin Comments***

37. Vijay Dewar was born in India.

38. I believe Nevin Dewar was born in the United States.

39. During my employment, Vijay and Nevin Dewar often spoke to each other in a foreign language.

40. Vijay and Nevin Dewar frequently made comments that Americans were "stupid" and "lazy."

***Bonus That Were Promised & Never Paid***

41. From time to time, Vijay Dewar would tell me that if I completed certain projects, I would be paid a bonus.

42. One such project that I was promised a bonus for was changing the rental amounts in the computer system so that Gold Crown could argue that its property taxes should be lowered. I would later go back into the computer system and increase the rent to the amount that the tenant was actually charged.

43. Vijay Dewar promised to pay me a bonus for performing the extra work of changing the rental rates for tax purposes, but I was never paid the bonus.

44. Vijay Dewar also promised me a bonus for searching for tax sale properties that he could purchase for an investment.

45. I performed the extra work of searching for tax sale properties, but Vijay Dewar never paid me the bonus he promised.

***Disability & Other Slurs Directed at Me***

46. In January or February 2016, Vijay Dewar told me that I was being moved to Torries Chase.

47. After I moved to Torries Chase, Vijay and Nevin Dewar began to harass me about my size and age (I am in my sixties).

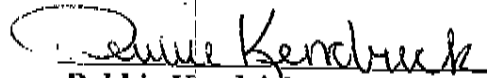
48. Vijay and Nevin Dewar frequently called me "fat," "lazy," "handicapped," and "too old to do the job."

49. Vijay and Nevin Dewar often yelled at me and unnecessarily criticized my work.

50. On or about July 23, 2016, Vijay Dewar terminated my employment, but made me sign a statement that stated that I had resigned.

I declare under perjury that the foregoing is true and correct.

Executed on this 15 day of January, 2020.

  
Debbie Kendrick